

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOHN KARARO, et al., individually and)
on behalf of all similarly situated) Case No. 23-cv-02187
current and former employees,)
Plaintiffs,) The Honorable Jorge L. Alonso
v.)
OLD DOMINION FREIGHT LINE INC.,) Jury Trial Demanded
Defendant.)

**PLAINTIFFS' FOR LEAVE TO FILE ITS CORRECTED 18 PAGE RESPONSE IN
OPPOSITION TO DEFENDANT'S MOTION TO DISMISS, DKT. 96-97**

NOW COME Plaintiffs JOHN KARARO, et al., (collectively as "Plaintiffs") and respectfully move to file a Corrected 18-page Response IN Opposition to Defendant's Motion to Dismiss (Dkt. 96-97) and in support state:

1. On February 8, 2024. Dkt. 118, Plaintiffs file a motion for leave of court to file (instanter) an 18-page Memorandum of Law in Opposition to Defendant's Motion to Dismiss, Dkt. 96, which in combination with Defendant's Memorandum of Law, amounted to 18 pages.

2. After filing said motion for leave, Plaintiffs' filed its Response in Opposition on On February 8, 2024, but the Response *exceeded* 18-pages and did not comply with Local Rule 7.1. Dkt. 120. In order to reduce the pages, Defendant made non-substantive changes to its Response, where it eliminated certain citations, fixed typographical errors and *added* one case citation (at page 12) of Plaintiffs' Response. Plaintiff also included a table of contents and table of authorities to comply with LR 7.1. As such, no harm or prejudice will result from granting the relief sought by this motion.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court grant them leave to file the Corrected Response, which is attached to this Motion as Dkt. 121-1.

Dated: February 9, 2024

Counsel for Plaintiffs and the putative Class Members,

/s/ James C. Vlahakis
James C. Vlahakis
VLAHAKIS LAW GROUP LLC
20 N. Clark Street, Suite 3300
Chicago, Illinois 60602
jamesv@vlahakislaw.com
312-648-6127

CERTIFICATE OF SERVICE

I certify that on February 9, 2024, a copy of the foregoing **MOTION** was served via email on counsel for Defendant:

Jody Kahn Mason
Jason A. Selvey
Hannah G. Garlough
Jackson Lewis P.C.
150 N. Michigan Ave. Suite 2500
Chicago, IL 60601
Jody.Mason@jacksonlewis.com
Jason.Selvey@jacksonlewis.com
Hannah.Garlough@jacksonlewis.com

By: */s/ James C. Vlahakis*
James C. Vlahakis
VLAHAKIS LAW GROUP LLC
20 N. Clark Street, Suite 3300
Chicago, Illinois 60602
jamesv@vlahakislaw.com
312-648-6127